

OLIVIA GARCIA
ROBERT J. BUFFIN
MICAHA BERUL
KATHLEEN C. SCHNEIDER
Region 20
901 Market Street, Suite 400
San Francisco, California 94103
Telephone: (415) 356-5130/356-5157
Facsimile: (415) 356-5156

Attorneys for Applicant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NATIONAL LABOR RELATIONS BOARD,)

Applicant,)

vs.)

OLGA MIRANDA,)

Respondent.)

Civil No.: Civ Misc 08-80041 VRW

NOTICE OF MOTION AND
MOTION OF NATIONAL LABOR
RELATIONS BOARD
FOR DEFAULT JUDGMENT
REQUIRING OBEDIENCE TO
INVESTIGATIVE SUBPOENAS

Date of Hearing: June 12, 2008

Time of Hearing: 2:30 p.m.

Courtroom 6

The National Labor Relations Board ("Board") respectfully applies to this Court, pursuant to Rule 55, Red. R. Civ. P., for a default judgment against Olga Miranda ("Miranda"), requiring her to obey an administrative subpoena issued by the Board in connection with an investigation to determine whether Service Employees International Union, Local 87, of which Miranda was the president at the time in question, committed certain unfair labor practices. In support thereof, the Board shows as follows;

1. On March 24, 2008, the Board filed its Application for Order Requiring Obedience to Subpoena Ad Testificandum No. A-805414 and Subpoena Duces Tecum No. B-556219 requesting that this Court require Miranda to obey the investigative subpoenas issued to her by the Board.

2. On March 31, 2008, the Court issued an Order to Show Cause requiring Miranda to file her response to the Board's application on or before April 14, 2008.

3. Miranda has not responded to the Board's application. Accordingly, a default judgment under Rule 55 is appropriate. A proposed order is submitted herewith for the Court's consideration.

DATED AT San Francisco, California, this 9th day of May, 2008.

Respectfully submitted,


NATIONAL LABOR RELATIONS BOARD

Ronald E. Meisberg
General Counsel

Olivia Garcia
Regional Attorney for Region 20

Robert J. Buffin
Deputy Regional Attorney, Region 20

Micah Berul
Attorney for Applicant
National Labor Relations Board


Kathleen C. Schneider
Attorney for Applicant
National Labor Relations Board